

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

INGENIADOR, LLC,

Plaintiff,

v.,

ALFRESCO SOFTWARE, INC.; *et al.*,

Defendants.

CIVIL NO. 11-1840 (GAG)

FIRST REQUEST FOR ENLARGMENT OF TIME
TO PLEAD OR OTHERWISE DEFEND

TO THE HONORABLE COURT:

COMES NOW the co-defendant, **Hewlett-Packard, Inc.** (“Hewlett-Packard”), specially appearing by and through its attorneys, without submitting to the jurisdiction or venue of this forum nor waiving any other defense, and hereby very respectfully requests a first extension of time of thirty (30) days, until **November 14, 2011**, to plead or otherwise defend as follows:

1. Upon information and belief, the plaintiff filed the captioned matter against Hewlett-Packard and other co-defendants on or about August 26, 2011. See, Docket No. 1.

2. On or about September 22, 2011, the plaintiff served Hewlett-Packard with a copy of the complaint and summons. If service was properly effected, Hewlett-Packard would have until October 13, 2011 to plead or otherwise respond.

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3. Hewlett-Packard needs more time to, among other things, analyze the plaintiff's claims, ascertain whether service of process was effective, jurisdiction and venue proper, and determine how to plead or otherwise defend.

4. Therefore, pursuant to Local Rule 6 of this Court and Rule 6(a) of the Federal Rules of Civil Procedure ("FRCP"),¹ Hewlett-Packard requests a first extension of time of thirty (30) days counted from October 13, 2011 to plead or otherwise defend and/or request. The requested extension of time would expire on November 14, 2011.²

WHEREFORE, pursuant to Local Rule 6(a) and FRCP 6(a), Hewlett-Packard moves for a first extension of time of thirty (30) days to respond to, or otherwise defend from, the plaintiff's complaint, said extension expiring on November 14, 2011.

I CERTIFY that today, I presented the foregoing to the Clerk of the Court for filing and uploading to the CM/ECF system which will send electronic notification of such filing to plaintiff's counsel.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 5th day of October, 2011.

FIDDLER, GONZÁLEZ & RODRÍGUEZ, PSC

**Attorneys for Defendants Hewlett-Packard, Inc.
and Microsoft Corporation**

¹ According to Local Rule 6, "[t]he clerk is authorized to enter orders granting a first extension of time, provided it encompasses a period not to exceed thirty (30) days. Any further extensions of time can only be granted by the Court."

² Technically, the requested enlargement would expire on November 12, 2011. However, November 12, 2011 is a Saturday. Pursuant to FRCP 6(a)(1)(C), Hewlett-Packard would have until Monday, November 14, 2011, to plead or otherwise respond and/or request.

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